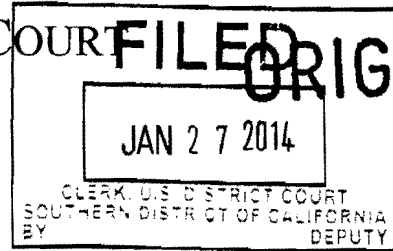


UNITED STATES DISTRICT COURT

for the

Southern District of California



In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

Case No.

Express Mail Parcel EU963902292US, addressed to
Erin Thomas, 3922 Hahns Ln, Apt B, Greensboro,
NC 27401

'14 MJ 0308

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that there is now concealed on the following person or property located in the Southern District of California (identify the person or describe property to be searched and give its location): Express Mail Parcel EU963902292US, addressed to Erin Thomas, 3922 Hahns Ln, Apt B, Greensboro, NC 27401 which is in the custody of the US Postal Inspection Service in San Diego, California.

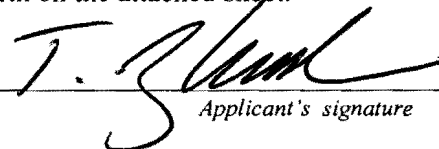
The person or property to be searched, described above, is believed to conceal (identify the person or describe the property to be seized): Controlled substances, materials, and documents reflecting the distribution of controlled substances through the United States Mails, including money paid for controlled substances, in violation of Title 21, U.S.C., Sections 841(a)(1), 843(b), and 846.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of 21 U.S.C. § 841(a)(1), and the application is based on these facts: See attached affidavit of Postal Inspector T. Babcock

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

T. Babcock - Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/27/2014



Judge's signature

City and state: San Diego, California

DAVID H. BARTICK, United States Magistrate Judge

Printed name and title

AFFIDAVIT FOR SEARCH WARRANT

I, T. Babcock, being duly sworn hereby depose and state:

1. I am a United States Postal Inspector currently assigned to the San Diego Field Office of the United States Postal Inspection Service and my duties include investigating violations of the Drug Abuse Prevention and Control Act.
2. This affidavit is submitted in support of an application for a search warrant for the following Express Mail Parcel:
 - Express Mail Parcel EU963902292US, addressed to “Erin Thomas, 3922 Hahns Ln, Apt B, Greensboro, NC 27401.” The parcel has the return address information of “Tay Thomas, 389 Mollison Ave, El Cajon, CA 92020.”
3. I have been employed as a Postal Inspector since May 2004. From May 2004 through August 2004, I attended the Basic Postal Inspector Academy. Starting in August 2004, I was assigned to the External Crimes Mail Theft and Violent Crimes Team of the Postal Inspection Service. My duties include the investigation of mail theft and violent crimes involving the United States Postal Service employees and facilities. In October 2009, I was assigned to the Prohibited Mailings Illegal Narcotics Team. I have received training from the U.S. Postal Inspection Service which included instruction regarding individuals using the U.S. Mails to transport controlled substances and proceeds from the sale of controlled substances, as well as the use of Postal Money Orders to launder the proceeds of controlled substances transactions.
4. Based upon my training, experience and discussions with other Postal Inspectors and Agents I know the following in summary:
 - a. Individuals who regularly handle controlled substances leave the scent of controlled substances on the currency and other items they handle. Proceeds from

these sales are often stored in close proximity to the controlled substances, thereby transferring the odor of the controlled substance to the monies and packaging materials. Narcotic canines are trained to alert on the scents of controlled substances.

- b. The Postal Inspection Service and DEA Narcotic Task Force Commercial Interdiction Team have worked aggressively to limit the use of shipping companies and the U.S. Mail for the transportation of controlled substance through these companies.
- c. Ongoing investigations have disclosed that Priority/overnight and “two day” parcel deliveries have become a method of choice by drug dealers for the transportation of contraband or the proceeds of narcotic sales.
- d. I know that Southern California is a source region for controlled substances being mailed throughout the United States. The proceeds from these narcotic transactions are then transported via the U.S. Mails and other communication facilities back to Southern California, the source of the controlled substances.
- e. Drug dealers prefer the U.S. Mail, (but will sometimes utilize commercial shipping companies), specifically “Express Mail” or “Priority Mail,” for the narcotic or narcotic proceeds transportation for various reasons, some of which are listed below:
 - 1. Items sent via “Express Mail” or “Priority Mail” are considered to be first-class mail, therefore, cannot be examined without a Federal Search Warrant.
 - 2. “Express Mail” is usually requested to be delivered by the next day’s mail.
 - 3. “Priority Mail” is usually requested to be delivered within two days of mailing.

4. Dispatch times for "Express Mail" are specific and are controllable by the mailer/shipper.
 5. Any delay to the mail is an indication to the mailer the mail items have been possibly compromised by law enforcement agencies to obtain a search warrant.
 6. While it is not always the case that a delay of "Express Mail" or "Priority Mail" is for law enforcement purposes, those involved in illegal transactions have found that the odds are against delays in deliveries of "Express Mail" or "Priority Mail" by United States Postal Service.
 7. "Express Mail" and Priority Mail" may weigh up to 70 pounds and is desired for large volume shipments.
-
- f. Businesses are more likely to use Express Mail and Priority Mail in the course of normal business and will often use an Express Mail Corporate Account Number for the billing of the mailed articles.
 - g. Criminals who are involved in trafficking of controlled substances and drug proceeds will often receive multiple Express Mail articles within a short time period of each other.
 - h. I also know that drug related parcels containing currency, checks or money orders sometimes do not contain the presence of controlled substances because persons involved in shipping often utilize packing methods and sanitation procedures to conceal the odor of controlled substances.
 - i. I also know from talking to U.S. Postal Service Supervisors and employees responsible for handling the mail that Express Mail is insured for up to \$100 in case of loss or damage. Insurance for Priority Mail may be purchased at an additional fee. Customers are discouraged from sending U.S. currency via the U.S. Mails and are encouraged to purchase negotiable instruments as a means to send currency by the U.S. Postal Service.

5. The information in this affidavit is based upon information I have gained from my investigation, my personal observations, my training and experience as well as information related to me by other Postal Inspectors and law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.
6. In October 2013, Postal Inspection personnel located suspicious mailings while reviewing filed express mail labels. A series of express mail parcels were identified mailed from San Diego, CA to Greensboro, NC, and a series related express mail parcels were identified mailed from Greensboro, NC to San Diego, CA. I know from previous investigations that narcotic traffickers will often use USPS express mail to send narcotics from San Diego, CA and use USPS express mail services to receive the proceeds from the narcotics shipments.
7. On November 14, 2013, Postal Inspection personnel researched USPS databases and located express mail parcel EM991270027US inbound to El Cajon, CA from Greensboro, NC. I called the El Cajon Post Office and learned the parcel was addressed to Taishaun White, 291 Indiana Ave, El Cajon, CA 92020. Taishaun White is listed on previous express mail parcels suspected of containing narcotics and/or narcotics proceeds. I advised the El Cajon Post Office to hold the parcel.
8. On November 14, 2013, I went to the El Cajon Post Office to examine express mail parcel EM991270027US. The parcel was addressed to Taishaun White, 291 Indiana Ave, El Cajon, CA 92020, with the return address of Edward Carter, 505 S. Benbow Rd, Greensboro, NC 27401. The parcel was mailed at on November 13, 2013 at 4:54 pm, weighed 1 pound 9 ounces, and was mailed from Greensboro, NC post office with zip code 27420. The parcel did not contain a waiver of signature. While at the El Cajon Post Office, I received information that someone had recently called looking for express mail parcel EM991270027US, and had requested a call back at 619-739-3429.

9. I became suspicious of the subject parcel for the following reasons: the size, shape and appearance of the parcel was consistent with parcels previously identified in other investigations that contained narcotics proceeds; the parcel was mailed via overnight express mail from Greensboro, NC to El Cajon, CA; the parcel was mailed at approximately 4:53 pm, just prior to the 5:00 pm cut off for Express Mail parcels to ensure next day delivery; and the parcel contained the same names and addresses on previous express mail parcels suspected of containing narcotics and/or narcotics proceeds. I took possession of the parcel for further investigation.
10. On November 18, 2013, I obtained and executed a federal search warrant on Express Mail parcel EM991270027US. The parcel was found to contain \$12,270 in US Currency.
11. On January 23, 2014, Postal Inspection Service personnel located an express mail parcel going to Greensboro, NC, mailed from El Cajon, CA. The parcel was addressed to Erin Thomas, 3922 Hahns Ln, Apt B, Greensboro, NC 27401, with the return address of Tay Thomas, 389 Mollison Ave, El Cajon, CA 92020. The address of 3922 Hahns Ln, Apt B, Greensboro, NC 27401 is listed on previous express mail parcels suspected of containing narcotics. I requested to have the parcel mailed to the Postal Inspection Service San Diego Field Office for further investigation.
12. On January 24, 2014, I took possession of Express Mail parcel EU963902292US. The parcel weighs 6 pounds 13 ounces, contains a waiver of signature, and was mailed from the El Cajon Bostonia Post Office on January 23, 2014 at approximately 12:26 pm.
13. I made an inquiry with Accurint, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name and address information. I researched the name and address information of Erin Thomas, 3922 Hahns Ln, Apt B, Greensboro, NC 27401 and determined this is a valid address, but the name Erin Thomas is not associated with this address. I researched return name and address information of Tay Thomas, 389 Mollison Ave, El Cajon, CA 92020 and determined this is a valid address, but the name Tay Thoams is not associated with this address. I know from


previous investigations that drug traffickers will sometimes attempt to conceal their identities by using fictitious names and/or return addresses to avoid identification and/or detection by law enforcement.

14. On January 27, 2014, I met with San Diego Harbor Police Officer Pedro Arce and his trained narcotic detection canine, "Quinny", in Chula Vista, CA. Officer Arce and canine Quinny conducted an exterior examination of subject Express Mail Parcel EU963902292US. When canine Quinny examined the subject parcel described above, Officer Arce advised that canine Quinny had alerted to the presence of the odor of controlled substances on the parcel.
15. Based on the facts set forth in this affidavit, I submit that there is probable cause to believe controlled substances, notes and/or currency from the illegal sale and mailing of controlled substances is being concealed in Express Mail Parcel EU963902292US, and seek the issuance of a search warrant directing the search of the articles as described above and the seizure of the articles, any controlled substances, currency, and/or materials and documents reflecting the distribution of controlled substances, all in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.


T. Babcock
Postal Inspector

Sworn to before me, and subscribed in my presence, on this

27th Day of JANUARY, 2014


DAVID H. BARTICK
U. S. Magistrate Judge